

In The United States District Court
For The District Of Delaware

James W. Riley,
Plaintiff,

v.

Stanley Taylor, et al.,
Defendants.

x

x

x

x

x

x

x

C.A. No. # 06-01-GMS

Rule 34

Motion For Production Of Documents
3



By scanned

Plaintiff, James W. Riley, request that all defendants (DCC/CMS) provide him with copies of the following documents:

1. Any and all sick call complaints filed by plaintiff with CMS' DCC medical staff in the month of May 2002.

2. The entire CMS medical records/files for the month of May 2002 pertaining to plaintiff Riley.

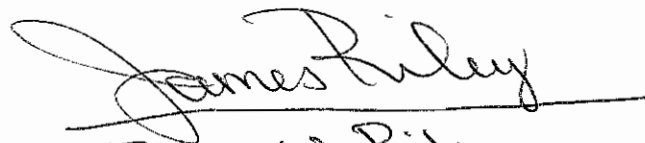
3. All sick call complaints filed with DCC medical staff regarding Plaintiff's rectal dysfunction from May of 2002 thru December of 2002.

4. On four (4) occasions between 2002 and March 2008, a CMS' DCC doctor ordered that plaintiff be examined by outside Specialist for his rectal dysfunction, but all referrals were arbitrary disapproved by CMS. Plaintiff specifically request all documents (e.g. doctor orders and CMS disapprovals) and any other information;

memorandums or letter of disapprovals by DCC officials and CMS relating to the four (4) disapprovals of doctor's orders for plaintiff to be evaluated by outside qualified Specialist for his rectal dysfunction. The most recent doctor's examination and referral for Specialty Care was today March 20, 2008. (a large lump was reaffirmed to be on the wall of plaintiff's rectum).

The above requested documents shall be consistent with plaintiff's pending Motion To Compel Discovery dated December 13, 2007. (I.D. 70).

Wherefore, defendants DCC and CMS officials are further Compelled to provide plaintiff with the above requested documents within 30-days after receipt of this motion.


James W. Riley
Del. Corr. Ctr.
Smyrna, Dela. 19977

March 20, 2008

Certificate of Service

I, James Riley, hereby certify that I have served a true and correct copy(ies) of the attached: Motion For Production of Documents #3 upon the following parties/person (s):

TO: Ophelia M. Waters
Deputy Attorney General
Department of Justice
820 N. French Street
Wilmington, Delaware 19801

TO: _____

TO: Kevin J. Connors
1220 N. Market St., 5th Fl.
P.O. Box 8888
Wilmington, Delaware
19899-8888

TO: _____

BY PLACING SAME IN A SEALED ENVELOPE and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 20 day of March, 2008

James Riley

IM James Riley

SBI# 169016-47 UNIT SW, Bldg. 17

DELAWARE CORRECTIONAL CENTER

1181 PADDOCK ROAD

SMYRNA, DELAWARE 19977

Clerk's Office

24. S. District Court

844 King St., Locker #18

Williamson, Devereaux

19801

5087

1. The first part of the document is a list of names and addresses, which appears to be a directory or a list of contacts. The names are written in a cursive script, and the addresses are listed below them.

